NORLITE, LLC

628 SO. SARATOGA STREET
PO BOX 684
COHOES, NY 12047
PHONE: (518) 235-0401
FAX: (518) 235-0233

August 28, 2014

Ms. Nancy Baker
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedances Report
Kiln 1: 07/24/14 – 08/28/14
Kiln 2: 07/24/14 – 08/28/14

Dear Sir/Madam:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite, LLC (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 07/24/14 thru 08/28/14. The attached document explains each of the "malfunctions" for Kilns One and Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the 1 second time delay and HRA associated with the rear chamber pressure being met. The majority of the rear chamber pressure cutoffs were related to non-LGF Fuel processing activities. The primary cause for these cutoffs was the formation of a crack in the Kiln 2 primary air fan housing which reduced the efficacy of the fans drawing ability and thus the overall system. A temporary patch as well as a wield was applied in an attempt to restore proper operation of the fan with no avail. A new housing has been ordered and is in the process of being manufactured. Once received, Norlite will install the new housing and fully restore operation of the system. A Kiln 2 shutdown is planned for the week of September 2nd during which time Norlite is planning to replace the housing as long as it arrives as scheduled.

Norlite has been working to resolve stack gas span cutoffs in general for almost two years. Norlite has been working with the DEC to install a new optical flow technology to monitor stack gas flow rate. A test unit has been installed on Kiln 1 and RATA tested on November 26, 2013. The final RATA Testing report was submitted along with a proposal for implementing official use of the unit to the DEC on December 24, 2013. Norlite prepared and submitted a permit modification request to the Department on March 25, 2014 and received approval for the permit modification on April 16, 2014. On April 18, 2014 at 1:00 PM, Norlite placed the Optical Flow Sensor for Kiln 1 into certified operation. Since April 18th, there have been no stack gas flow rate cutoffs which have occurred on Kiln 1. The previous stack gas flow rate measuring technology has remained in place for data collection but is no longer part of the AWFCO system. Since receiving approval for the Kiln 1 permit modification, Norlite has ordered and installed an optical flow sensor on Kiln 2. On May 27th, Norlite conducted preliminary testing and data collection on the Kiln 2 unit to further help setup and troubleshooting. Norlite believed to have the issues which were affecting the

optical flow sensor resolved but has decided further troubleshooting and testing is needed before a RATA test can be scheduled. Norlite has cancelled the RATA test which was scheduled for July 15, 2104. Once Norlite is confident the optical flow sensor is functioning properly; a RATA test will be setup. Once passing RATA results are obtained, Norlite will prepare a permit modification similar to the Kiln 1 permit modification for submittal and approval for Kiln 2.

Norlite has been working with the DEC to improve LGF delivery and handling at the kilns to address these types of cutoffs. In April 2013, the DEC conditionally approved Norlite's plan to remove the minimum LGF Line Pressure requirement, allow a positive displacement pump to be used for fuel flow control, and allow the use of a recirculation line for use during times when off LGF. The DEC also requested a six month study be conducted without a minimum LGF Line Pressure requirement. The study was started on May 01, 2103 and completed on October 31, 2013. Norlite conducted an extensive search for a positive displacement pump which would allow variable speed control, have tight pump tolerance, and have suitable reliability for long term use. The results of the six month study which summarized over 4 million lines of operational data between the two kilns was submitted to the DEC on December 5, 2013. Based from the results of the six month study, Norlite feels the data supports the removal of the minimum LGF Line Pressure requirement. Norlite has concluded that a positive displacement pump which meets all the needed criteria does not exist. As stated previously, Norlite has acquired the assistance of a process engineering firm to assist in the search for a suitable positive displacement pump and conduct an overall review of the entire kiln feed system to provide a proposal for improving the kiln fuel feed system. The process engineering firm has been supplied with facility drawings, had several discussions with Norlite personnel, and taken a facility tour to better understand the facility operations as they relate to fuel delivery at the kilns. Norlite submitted a proposal provided by SPEC Engineering to the DEC on December 31, 2013 for review and approval. The proposal was to use an automated control loop to control pressures and fuel flow rates at the kilns. On January 13, 2014, the DEC approved the overall concept of the proposal with the requirement that additional engineering specifications be provided by certain dates for ultimate approval of the entire project.

Norlite and SPEC Engineering have completed an extensive hydraulic study of the entire LGF Fuel delivery system to ensure that proper velocities can be maintained throughout the piping system to prevent material buildup and keep the LGF homogeneously mixed. Norlite and SPEC Engineering have also meet with the DEC or spoke with the DEC on the phone several times to go over the hydraulic study as well as keep the Department up to date on the overall progress of the project. Norlite and SPEC Engineering are in the final phase of the engineering design of the overall kiln fuel delivery system, including 3D drawings of the piping to help visualize the overall project. Norlite and SPEC have confirmed their commitment to ensuring the kiln fuel delivery system operates as expected with as few troubleshooting issues as possible. For this to occur, additional engineering has been needed during the current design phase. Norlite met with the DEC in early April to go over the fuel piping layout and other related engineering design aspects. Norlite and SPEC have finalizing the engineering and are preparing bid packages for vendors. The final engineering plans will be submitted shortly for DEC review and approval. When the DEC reviews the engineering design, Norlite will continue with procurement and installation.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

NORLITE, LLC

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tom.vanvranken@tradebe.com.

Sincerely,

Thomas M. Van Vranken

Thomas M. Van Vranken
Environmental Manager

Attachments
ecc: Thomas Killeen, NYSDEC
Joseph Hadersbeck, NYSDEC
Tita LaGrimas, Tradebe
Mike Cruden, NYSDEC
Margaret Moss, NYSDEC
Gerard Burke, NYSDEC
Don Spencer, NYSDEC

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 1
07/24/14 - 08/28/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
7/25/2014	14:01:58	7/25/2014	14:05:36	0:03:38	157	Malfunction	The Operators Were Controlling Fuel Flow Using Valves Which Caused a Fuel Surge to Occur and Trigger the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
7/28/2014	3:42:35	7/28/2014	3:43:37	0:01:02	158	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Baghouse Inlet Temperature Span Due to the Thermocouple Failing and Causing Faulty Inputs	Baghouse Inlet Temp.	Span	I&E Replaced the Thermocouple and Calibrated It to Ensure Proper Operation
7/29/2014	16:14:49	7/29/2014	16:25:05	0:10:16	159	Malfunction	The Operators Were Controlling Fuel Flow Using Valves Which Caused a Fuel Surge to Occur and Trigger the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/1/2014	9:54:15	8/1/2014	9:55:46	0:01:31	160	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber pH Span Due to the PLC Input Card Faulting	Scrubber pH	Span	Due to the Intermittent Nature of the Problem, I&E Conducted Troubleshooting All Day Until the Bad Card Was Discovered
8/1/2014	12:21:11	8/1/2014	12:23:44	0:02:33	161	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber pH Span Due to the PLC Input Card Faulting	Scrubber pH	Span	Due to the Intermittent Nature of the Problem, I&E Conducted Troubleshooting All Day Until the Bad Card Was Discovered
8/1/2014	12:47:54	8/1/2014	12:48:16	0:00:22	162	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber pH Span Due to the PLC Input Card Faulting	Scrubber pH	Span	Due to the Intermittent Nature of the Problem, I&E Conducted Troubleshooting All Day Until the Bad Card Was Discovered
8/1/2014	12:53:52	8/1/2014	12:54:12	0:00:20	163	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber pH Span Due to the PLC Input Card Faulting	Scrubber pH	Span	Due to the Intermittent Nature of the Problem, I&E Conducted Troubleshooting All Day Until the Bad Card Was Discovered
8/3/2014	2:10:13	8/3/2014	8:12:25	6:02:12	164	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Causing the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span / The Blowdown Pump Was Replaced	LGF Flow	Span	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 1
07/24/14 - 08/28/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
8/4/2014	22:21:38	8/4/2014	22:23:51	0:02:13	165	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber pH Span Due to the Sample Loop Being Plugged With Soda Ash Solids	Scrubber pH	Span	I&E Determined the Sample Loop Was Plugged and Cleaned It Out
8/7/2014	12:53:05	8/7/2014	13:00:17	0:07:12	166	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Causing the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/7/2014	13:00:21	8/7/2014	13:00:45	0:00:24	167	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Causing the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/18/2014	20:31:04	8/18/2014	20:31:27	0:00:23	168	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Baghouse Inlet Temperature Due to a Bad Thermocouple Connection Located Halfway to the MMC Room Which Was Causing the Unit to Fault	Baghouse Inlet Temp.	Span	Due to the Intermittent Nature of the Problem, I&E Conducted Extensive Troubleshooting Until the Bad Thermocouple Connection Was Located
8/18/2014	23:58:25	8/18/2014	23:58:45	0:00:20	169	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Baghouse Inlet Temperature Due to a Bad Thermocouple Connection Located Halfway to the MMC Room Which Was Causing the Unit to Fault	Baghouse Inlet Temp.	Span	Due to the Intermittent Nature of the Problem, I&E Conducted Extensive Troubleshooting Until the Bad Thermocouple Connection Was Located
8/19/2014	8:09:19	8/19/2014	8:10:10	0:00:51	170	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Baghouse Inlet Temperature Due to a Bad Thermocouple Connection Located Halfway to the MMC Room Which Was Causing the Unit to Fault	Baghouse Inlet Temp.	Span	Due to the Intermittent Nature of the Problem, I&E Conducted Extensive Troubleshooting Until the Bad Thermocouple Connection Was Located
8/19/2014	8:15:43	8/19/2014	8:16:36	0:00:53	171	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Baghouse Inlet Temperature Due to a Bad Thermocouple Connection Located Halfway to the MMC Room Which Was Causing the Unit to Fault	Baghouse Inlet Temp.	Span	Due to the Intermittent Nature of the Problem, I&E Conducted Extensive Troubleshooting Until the Bad Thermocouple Connection Was Located

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 1
07/24/14 - 08/28/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
8/19/2014	8:48:16	8/19/2014	8:48:42	0:00:26	172	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Baghouse Inlet Temperature Due to a Bad Thermocouple Connection Located Halfway to the MMC Room Which Was Causing the Unit to Fault	Baghouse Inlet Temp.	Span	Due to the Intermittent Nature of the Problem, I&E Conducted Extensive Troubleshooting Until the Bad Thermocouple Connection Was Located
8/22/2014	5:03:27	8/22/2014	5:03:55	0:00:28	173	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Chamber Differential Pressure System	Back Chamber Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/22/2014	5:05:37	8/22/2014	5:06:03	0:00:26	174	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure	Front Kiln Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/22/2014	5:06:07	8/22/2014	5:06:28	0:00:21	175	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure And Rear Chamber Pressure System	Simultaneous Front and Back Chamber Pressure	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/25/2014	14:15:13	8/25/2014	14:16:20	0:01:07	176	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Chamber Differential Pressure System	Back Chamber Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
07/24/14 - 08/28/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
7/26/2014	16:47:28	7/26/2014	16:47:48	0:00:20	221	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure	Front Kiln Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
7/26/2014	16:47:53	7/26/2014	16:50:09	0:02:16	222	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure	Front Kiln Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/1/2014	6:45:23	8/1/2014	6:46:06	0:00:43	223	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber Recirc. Rate Span Due to the Operators Running At An Increased Rate to Help Keep the Scrubber System Flushed	Scrubber Recirc. Rate	Span	The Operators Reduced the Flow Rate Setting
8/2/2014	1:03:48	8/2/2014	3:22:59	2:19:11	224	Malfunction	After Rinsing the Mist Pad, Excess Water In the System Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span Due to Water Droplets Contacting the Probe	Stack Gas Flow Rate	Span	The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe
8/6/2014	5:11:26	8/6/2014	5:21:00	0:09:34	225	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe	Stack Gas Flow Rate	Span	The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe
8/8/2014	0:10:13	8/8/2014	0:10:42	0:00:29	226	Malfunction	The LGF Pump Started Surging Which Caused Flame Pulsing in the Kiln That Simultaneously Affected the Front Kiln Pressure and Rear Chamber Pressure	Simultaneous Front and Back Chamber Pressure	Opl	Kiln Supervisor Stopped the LGF Pump and Switched Tanks
8/9/2014	15:15:08	8/9/2014	18:14:00	2:58:52	227	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber Recirc. Rate Span Due to the Operators Running At An Increased Rate to Help Keep the Scrubber System Flushed	Scrubber Recirc. Rate	Span	The Operators Reduced the Flow Rate Setting
8/12/2014	6:07:34	8/12/2014	6:13:21	0:05:47	228	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Causing the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/17/2014	23:28:03	8/17/2014	23:34:41	0:06:38	229	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure HRA	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
07/24/14 - 08/28/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
8/18/2014	0:44:02	8/18/2014	1:49:25	1:05:23	230	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure HRA	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not
8/18/2014	15:49:41	8/18/2014	15:50:03	0:00:22	231	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure, 1 Second Delay	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not
8/19/2014	11:19:56	8/19/2014	11:21:26	0:01:30	232	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Causing the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/20/2014	23:32:43	8/20/2014	23:33:19	0:00:36	233	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure, 1 Second Delay	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not
8/20/2014	23:33:23	8/20/2014	23:33:43	0:00:20	234	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure, 1 Second Delay	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not
8/22/2014	3:48:36	8/22/2014	9:37:38	5:49:02	235	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure HRA	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not
8/25/2014	0:40:51	8/25/2014	0:41:14	0:00:23	236	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber Recirc. Rate Span Due to the Operators Running At An Increased Rate to Help Keep the Scrubber System Flushed	Scrubber Recirc. Rate	Span	The Operators Reduced the Flow Rate Setting

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
07/24/14 - 08/28/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
8/25/2014	2:45:29	8/25/2014	2:45:56	0:00:27	237	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure	Front Kiln Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
8/25/2014	8:49:22	8/25/2014	8:49:51	0:00:29	238	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure, 1 Second Delay	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not
8/25/2014	10:13:18	8/25/2014	10:13:48	0:00:30	239	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure, 1 Second Delay	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not
8/25/2014	11:54:51	8/25/2014	11:55:28	0:00:37	240	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure, 1 Second Delay	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not
8/25/2014	11:55:45	8/25/2014	11:56:13	0:00:28	241	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure, 1 Second Delay	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not
8/25/2014	17:22:00	8/25/2014	18:27:33	1:05:33	242	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber Recirc. Rate Span Due to the Operators Running At An Increased Rate to Help Keep the Scrubber System Flushed	Scrubber Recirc. Rate	Span	The Operators Reduced the Flow Rate Setting
8/27/2014	4:15:51	8/27/2014	5:01:30	0:45:39	243	Malfunction	Communication Was Lost Between the Input Card and the PLC Which Caused the Backend Temperature to Fault Causing the Instantaneous Upper Instrument Setpoint to Be Reached for Backend Temperature Span	Backend Temperature	Span	I&E Cleaned the Contacts and Re-Seated the Input Card to Re-Establish Communications
8/27/2014	5:20:21	8/27/2014	5:21:08	0:00:47	244	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure	Front Kiln Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
07/24/14 - 08/28/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
8/27/2014	8:48:51	8/27/2014	10:44:25	1:55:34	245	Malfunction	A Crack Formed In the Fan Housing On Kiln 2 Which Supplies Draft to the Rear Chamber System Which Reduced the Efficacy of the Entire System Causing the Upper Limit for Rear Chamber System Pressure to be Reached	Back Chamber Pressure, 1 Second Delay	Opl	A Temporary Patch Was Placed Over the Crack Until A New Fan Housing Could Be Manufactured. A Wield of the Crack Was Attempted On 08/22/14 But Did Not